

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MARK I. SOKOLOW, *et al.*,

Plaintiffs,

vs.

THE PALESTINE LIBERATION
ORGANIZATION, *et al.*,

Defendants.

No. 04 Civ. 00397 (GBD) (RLE)

**DECLARATION OF PHILIP W. HORTON
IN SUPPORT OF PLAINTIFFS' MOTION IN LIMINE**

PHILIP W. HORTON hereby declares the following under penalty of perjury:

1. I am a member of the law firm of Arnold & Porter LLP, appearing *pro hac vice* as counsel for the plaintiffs in the above-captioned action. I submit this declaration to provide documents in support of plaintiffs' Motion in Limine.

2. Attached to this declaration as Exhibit A are true and correct copies of the following defendants' expert reports:

EXHIBIT A (tabs below)	Defendants' Expert Reports (Exhibits Omitted)
A.1	Expert Report of Lori Allen, dated July 15, 2013.
A.2	Expert Report of Muhammad Dahleh, dated July 15, 2013.
A.3	Expert Report of Rick Gaskins re: Personal Injury to Ms. Shayna Elliott, dated July 15, 2013.
A.4	Expert Report of David Miller, dated, July 15, 2013.
A.5	Expert Report of John Quigley, dated July 15, 2013.
A.6	Expert Report of Glenn Robinson, dated July 15, 2013.
A.7	Expert Report of Michael Sfard, dated November 6, 2011.
A.8	Expert Report of Raja Shehadeh, dated July 15, 2013.
A.9	Expert Report of Sharon Weill, dated July 15, 2013.

3. Attached to this declaration as Exhibit B are true and correct copies of the following expert depositions:

EXHIBIT B (tabs below)	Expert Deposition Excerpts
B.1	Excerpts from the Deposition of Rick Gaskins, dated November 7, 2013
B.2	Excerpts from the Deposition of Matthew Levitt, dated September 25, 2013.
B.3	Excerpts from the Deposition Transcript of David Miller, dated November 20, 2013.
B.4	Excerpts from the Deposition of Michael Sfard, dated October 24, 2013.

4. Attached to this declaration as Exhibit C is a true and correct copy of the following designated trial exhibits:

EXHIBIT C (tabs below correspond to trial exhibit numbers)	Designated Trial Exhibits
C.1	Defendants' designated trial exhibit bearing bates numbers 02:0078990-7915
C.2	Defendants' designated trial exhibit bearing bates number 02:007916
C.3	Defendants' designated trial exhibit bearing bates number 02:007941
C.4	Defendants' designated trial exhibit bearing bates numbers 02:007917-7940
C.5	Defendants' designated trial exhibit bearing bates numbers 02:007942-7966
C.6	Defendants' designated trial exhibit bearing bates numbers 02:007968-7976
C.7	Defendants' designated trial exhibit bearing bates numbers 02:007977-7980
C.8	Defendants' designated trial exhibit bearing bates number 02:007981
C.9	Defendants' designated trial exhibit bearing bates number 02:007967
C.12	Defendants' designated trial exhibit bearing bates number 02:008129
C.13	Defendants' designated trial exhibit bearing bates numbers 02:008130 - 8131
C.14	Defendants' designated trial exhibit bearing bates numbers 02:008132 - 8133
C.15	Defendants' designated trial exhibit bearing bates numbers 02:008134 - 8138
C.16	Defendants' designated trial exhibit bearing bates numbers 02:008139 - 8154
C.19	Defendants' designated trial exhibit bearing bates numbers 02:008195 -

	8197
C.23	Defendants' designated trial exhibit bearing bates numbers 02:008336 - 8338
C.28	Defendants' designated trial exhibit bearing bates numbers 02:008351 - 8419
C.29	Defendants' designated trial exhibit bearing bates numbers 02:008420-8453
C.36	Defendants' designated trial exhibit bearing bates numbers 02:008484 - 8498
C.38	Defendants' designated trial exhibit bearing bates number 02:008499
C.49	Exhibit D to Expert Report of G. Robinson
C.50	Defendants' designated trial exhibit bearing bates numbers 02:008501 - 8620
C.51	Defendants' designated trial exhibit bearing bates numbers 02:008621 - 8622
C.58	Plaintiffs' designated trial exhibit bearing bates numbers 05:000590 - 05:000591
C.375	Plaintiffs' designated trial exhibit bearing bates numbers P5:40 - 41
C.376	Plaintiffs' designated trial exhibit bearing bates numbers P5:42 - 43

5. Attached to this declaration as Exhibit D are true and correct copies of the following correspondence.

EXHIBIT D (tabs below)	Correspondence
D.1	Letter from Brian Hill to Hon. George Daniels, dated January 24, 2014
D.2	Letter from Kent Yalowitz to Brian Hill, dated February 14, 2014

6. Attached to this declaration as Exhibit E is a true and correct copy of Exhibit 1-2 to the Joint Pretrial Order.

7. Attached to this declaration as Exhibit F is a true and correct copy of Defendants' Rule 26(a)(1)(A) Disclosures, dated July 25, 2011.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Washington, D.C.
May 2, 2014



Philip W. Horton